

EXHIBIT F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(FM)

I, SHENAN BRADSHAW, hereby declare:

1. I am the stepdaughter of Sandra “Sandy” W. Bradshaw, a flight attendant who was killed in the September 11, 2001 Terror Attacks.

2. My father and biological mother divorced when I was 2 years old. I first met Sandy when she and my father were dating, roughly one year before they were married. I cannot remember a time in my life without Sandy in it.

3. Following their separation, my biological father and mother treated each other with disdain and flat-out hatred.

4. I was 4 years old when Sandy and my father married on October 12, 1990. I distinctly remember being the flower girl in their wedding and remember sprinkling rose petals on the aisle ahead of her and being very concerned that I would run out before we reached the altar.

5. During school periods, I usually lived with my biological mother but spent weekends, every other holiday, and 3 months of the summer with my father and Sandy. The two houses were only about an hour away from each other, and I would seek out as many opportunities as possible to spend days and nights at my dad and Sandy’s home. I had my own room with my own clothes, shoes, desk, and toys at dad and Sandy’s house. I had chores and responsibilities, and even earned an allowance there. I essentially grew up in both homes,

and, for me, Sandy was as much a parent as anyone else. I would estimate I lived with my dad and Sandy at least fifty-percent of the time.

6. While my biological parents were in constant emotional warfare with each other, the one constant calming presence was Sandy. She was the peace-keeper, or if that was not possible she was my distractor, shielding me from the battles between my parents.

7. My biological mother and I have always had a rocky relationship. My biological mother is not psychologically stable, and that interfered substantially in our relationship. My biological mother has, for as long as I can remember, felt emotionally absent to me. Having Sandy in my life replaced that void and was like having a mother who I could relate to and look up to, without the conflict and problems I experienced with my biological mother. Sandy and I went shopping together, she helped brush my hair, and when I got older helped me with my first attempts at make-up. I grew up going on vacations with my father and Sandy like any other family. We traveled to San Francisco, Boston, and Nantucket. Every summer we would spend a week at the beach with Sandy's family, a group of people I knew only as my grandparents, aunts & uncles, and cousins – not as “step” relatives. It was something I looked forward to every year, staying up late playing card games and playing pranks on the adults with my cousins. Every Christmas day dinner was spent at my grandmother's house (Sandy's mother) where the entire extended family enjoyed a potluck dinner and exchanged presents. Sometimes when I would come to Dad and Sandy's house on the weekends during the school year my father, an airline pilot, would have to work. Those weekends were always fun because I got to have a girl's weekend with Sandy. She would paint my nails for me and we would watch movies together, or we'd take trips to visit her sister in Washington DC.

8. When I was 12 years old, in December 1998 my father and Sandy had a baby girl, and I became an older sister to Alexandria. I never thought of her as a “half-sister.” I immediately took to the role of Alex’s big sister, changing her diapers, getting her dressed, feeding her and babysitting her. Then, almost two years later, in late September 2000, my dad and Sandy had a baby boy – my brother Nathan. After he was born, my sister Alex moved from the nursery to a bedroom right next to mine in dad and Sandy’s home. I was as happy to be a big sister to Nathan as I was to Alex.

9. Sandy was the calm, consistent mothering presence and strong female role model every young girl deserves. I don't mean to say everything was perfect and we always got along. I was still a child and would whine, argue, or misbehave sometimes and Sandy would discipline me and come up with some punishment worthy of my crime. Whether it was cleaning the guest room, polishing the silver, or helping with yard work. I hated it at the time but can now appreciate those hard-working tasks and consistent boundaries as an adult because it helped me become who I am now.

10. For all intents and purposes, Sandy was a mother to me – supervising me during the substantial times I lived with her (around fifty-percent of any given year from the time she and my father were together, starting when I was preschool age), functioning as a biological parent would (supervising my homework, taking care of my personal health and hygiene, arranging playdates and sleepovers) and providing me with the love, security and safety of a stable home, despite the toll that my biological parents’ emotional battles took on me. I always thought of Sandy as my mother and I still do.

11. I was 15 years old when Sandy was killed. After her death, I made many life choices to be able to remain close to Alex and Nathan, who were only two years old and less

than one year old when Sandy was killed. I chose to go to college close to home so that I could see them regularly. I attended their school plays and kindergarten "graduations". I was there for every birthday and after we lost Sandy in 2001 I was there for every holiday, making sure my young siblings remembered a happy, colorful Christmas when grief kept my father from enjoying the holiday. Christmas was always Sandy's favorite and my father could not bring himself to put up all her decorations alone, so I took on the role. It's not fair that I got all those years with Sandy and my brother & sister had to grow up without their mother. I wanted my siblings to have her presence just like I had all my childhood. Our family unit had been dad, Sandy, Alex, Nathan and me and I wanted to keep it as close to that as possible after Sandy's death.

12. To say losing Sandy on September 11, 2001, was devastating, to me personally and to my family, is a gross understatement and by no means encompasses all of my emotions. I do not know how to put into words what that kind of loss is like. I have learned to live with it and try to remember the Sandy of my childhood, but the wound is ever-present and still 20 years later thinking about that day and all the events that followed brings all those emotions rushing back like it was yesterday. It doesn't get easier with time, you just learn to live with it.

13. Though Sandy was not by biological parent, that she was, by title, my "step-mother" is only semantics. For me, her loss was the same loss felt by any teenager who loses a parent far too early. In the 21st century, I believe it is becoming universally understood that one does not need to be biologically related to have a genuine parent-child relationship. Sandy was as much my mother as anyone possibly could be, and I feel the pain of her loss as deeply as any biological child who has lost a parent would.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 5/19/22

Place: St. Louis, MO USA

Signature:

A handwritten signature in black ink, appearing to read 'Shenan Bradshaw', written over a horizontal line.

Print:

Shenan Bradshaw